

**Cooper**

**COOPER TIRE & RUBBER COMPANY**

LIMA & WESTERN AVENUES  
FINDLAY, OHIO 45840

RICHARD D. TEEPLE  
VICE PRESIDENT  
GENERAL COUNSEL

June 22, 1999

RECEIVED  
JUN 28 AM 9:13  
OFFICE  
DEFECTS INVESTIGATION  
(419) 424-7320  
Telecopy: (419) 424-7320

99T-004  
Amended

**CERTIFIED MAIL P 966 629 890  
RETURN RECEIPT REQUESTED**

Associate Administrator for Enforcement  
**NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION**  
400 7<sup>th</sup> Street, S.W.  
Washington, D.C. 20590

Re: NSA-11paw  
99T-004

Gentlemen:

Please reference my letter of February 19, 1999, wherein I notified you of the subject recall. For your convenience, a copy of this letter with attachments are attached hereto. In Attachment 1B to the Defect and Noncompliance Information Report, we listed Sears, Roebuck and Co. as the Brand Name Owner of the Viper Radial GT tires being recalled (68 in number). This is incorrect as Cooper Tire & Rubber Company is the owner of the trade name VIPER RADIAL GT. We are attaching an amended page 2 of the Defect and Noncompliance Information Report reflecting additions to the exhibits, an amended Attachment 1B to the Defect and Noncompliance Information Report, an amended Exhibit List, an amended and restated letter to Sears, Roebuck & Co., and an owner notification letter.

A copy of this letter with the above-referenced amended documents, the restated and amended letter to Sears, Roebuck and Co. and the proposed owner notification letter is being faxed to the Office of Defects Investigation (ODI) for review by ODI pursuant to 49 CFR Section 573.5(c)(10). We are asking ODI to approve the sample owner letter. Hard copy will follow. Unless advised otherwise by ODI, owner notification will begin June 30, 1999. Three copies of the appropriate notification to Sears and customers are attached.

Our envelope format for owner recall notification letters as required under 49 CFR 577.5(a) has been previously approved by ODI. See the attached. Cooper will provide the required quarterly report on the status of the above-mentioned campaign.

Associate Administrator for Enforcement

**NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION**

June 22, 1999

Page 2

Should any additional information be required or if there are any questions, please call me at 419/424-4318. I apologize for any inconvenience this may cause.

Very truly yours,

A handwritten signature in black ink, appearing to read "Richard D. Teeple". The signature is fluid and cursive, with the first name "Richard" and last name "Teeple" clearly distinguishable.

Richard D. Teeple

RDT/rlg

Attachments

cc: Office of Defects Investigation "NSA-10"  
Associate Administrator for Enforcement  
**NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION**  
400 7<sup>th</sup> Street, S.W.  
Washington, D.C. 20590  
Attn: Mr. Jon White, Chief  
Technical Analysis Branch  
202/366-7882-fax

**COOPER TIRE & RUBBER COMPANY**  
**DEFECT AND NONCOMPLIANCE INFORMATION REPORT**  
**AMENDED 6/22/99**

5. **DESCRIPTION OF DEFECT OR NONCOMPLIANCE** (Including brief summary and detailed description, with graphic aids as necessary, of nature and physical location of the defect or noncompliance):

The subject tires were produced between the dates of November 18, 1998 and December 1, 1998 and may not have adequate rubber coverage of the belt edge due to low tread gauge under the shoulder slots. When this condition exists, it may eventually cause cracking at the base of the slot resulting in exposed belt wires which could lead to accelerated belt degradation.

6. **CHRONOLOGY OF ALL PRINCIPLE EVENTS THAT WERE THE BASIS FOR THE EXISTENCE OF A SAFETY RELATED DEFECT** (Including a summary of all warranty claims, field service reports, and other information, with their dates of receipt):

The existence of the condition was determined by cut tire section analysis of tires built between 11/18/98 and 12/1/98. Through production records, we have determined a total gross cure of 3,474 tires were produced. A total of 3,258 tires have been accounted for in our inventory. There are a total of 216 tires which are unaccounted for. Cooper is voluntarily recalling these 216 tires.

7. **COMPLIANCE TESTING OR OTHER DATA THAT WAS THE BASIS FOR DETERMINING THE EXISTENCE OF NONCOMPLIANCE:**

The existence of the anomaly was discovered during cut tire section analysis.

8. **STATEMENT OF MEASURES TO BE TAKEN TO REMEDY THE DEFECT OR NONCOMPLIANCE:**

All tires captured in our distribution system that exhibit this condition have been scrapped. All unaccounted for tires with the affected DOT serial numbers are to be returned to one of our regional inspection points and will be scrapped.

9. **ENCLOSURES, IF ANY** (Three copies of all notices, bulletins and other communications that were sent to more than one distributor, dealer or purchaser and relate directly to the defect or noncompliance):

See Exhibit Index & Exhibits I - VI

**COOPER TIRE & RUBBER COMPANY**  
**DEFECT AND NONCOMPLIANCE INFORMATION REPORT**  
**AMENDED ATTACHMENT 1B**

DATE: 6/22/99

NHTSA CAMPAIGN NO. 99T-004

COOPER NO. 106

1. NAME OF MANUFACTURER

A. Fabricating Manufacturer: Cooper Tire & Rubber Company

B. Brand Name or Trademark Owner:

**BRAND NAME**

**OWNER**

VIPER RADIAL GT

COOPER TIRE & RUBBER COMPANY

2. **POTENTIAL NUMBER OF AFFECTED TIRES** (Including a description of the basis for the determination of the recall population and a description of how these items differ from similar items not included in the recall):

<u>Description (including size)</u>	<u>Inclusive Dates (week and year) of Manufacture</u>	<u>Number of Potentially Affected Units</u>	<u>Estimated Percent Containing Defect or Noncompliance</u>
P215/70R14 Tubeless Radial Standard Load			
Viper Radial GT	3DHYUDN468 Nov. 15, 1998 thru Nov. 21, 1998	38	24.6%
	3DHYUDN478 Nov. 22, 1998 thru Nov. 28, 1998	30	99.8%

3. TOTAL UNITS POTENTIALLY AFFECTED: 68

4. TOTAL ESTIMATED PERCENT CONTAINING DEFECT: 62.4%

COOPER RADIAL PASSENGER TIRE RECALL CAMPAIGN

AMENDED 6/22/99

- EXHIBIT I      NOTIFICATION TO COOPER DEALERS CONSISTING OF COOPER DEALER LETTER, COOPER CONSUMER LETTER AND FORMS (SEE EXHIBIT IV FOR FORMS) .
- EXHIBIT II     NOTIFICATION TO SEARS ROEBUCK & COMPANY CONSISTING OF SUGGESTED DEALER LETTER, SUGGESTED CONSUMER LETTER AND FORMS (SEE EXHIBIT IV FOR FORMS) .
- EXHIBIT III    NOTIFICATION TO COOPER PUERTO RICO DEALERS CONSISTING OF COOPER PUERTO RICO DEALER LETTER, COOPER PUERTO RICO CONSUMER LETTER AND FORMS (SEE EXHIBIT IV FOR FORMS) .
- EXHIBIT IV     FORMS AS INCLUDED IN NOTIFICATIONS ABOVE WHERE NOTED.
- EXHIBIT V      AMENDED & RESTATED NOTIFICATION TO SEARS, ROEBUCK AND CO.
- EXHIBIT VI     COOPER CONSUMER LETTER TO SEARS, ROEBUCK AND CO. CUSTOMERS.



# THE COOPER TIRE COMPANY

A DIVISION OF COOPER TIRE & RUBBER COMPANY

June XX, 1999

Mr. Joe Maher  
Tire Buyer  
Sears DC-251 B  
3333 Beverly Road  
Hoffman Estates, IL 60179

Re: Amendment and Restatement of Our Letter Dated March 1, 1999

Dear Mr. Maher:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Cooper Tire & Rubber Company has determined that a defect which relates to motor vehicle safety exists in some tires identified as follows:

P215/70R14 Viper Radial G/T 68 Tires

Identification numbers: 3DHYUDN468  
3DHYUDN478

Our company's surveillance indicates that the tires described above may not have adequate rubber coverage of the belt edge due to low tread gauge under the shoulder slots. Such a condition could result in a separation. If the separation is not detected, continued use may cause the ply cords to break and the tubeless liner to tear and lose the inflating air. Loss of air might result in loss of control with vehicle crash the potential occurrence.

Cooper Tire & Rubber Company is voluntarily recalling all of the tires with the identification numbers listed. Effective immediately, you or your dealers (stores) must not sell any of the tires listed and described above.

You should also comply with the following instructions regarding the return of new and used tires at no charge in accordance with such provisions.

## PROCEDURE FOR RETURN AND CREDIT OF RECALLED TIRES

### NEW TIRES:

All recalled new tires existing in your inventory, or in your sub-dealers' inventories, should be returned immediately in one shipment, freight collect, to Cooper Tire Company, Regional Inspection Point, 709 Glessner Ave., Findlay, Ohio 45840. To assure proper handling, these tires should be listed on the attached Returned Goods Form and the form must accompany this shipment in the packing slip envelope provided. This envelope must be listed on the bill of lading as: "1 envelope - related shipping documents."

SA1060699

Upon verification by Cooper that the tires returned are within the recall group, we will issue credit to you based upon your invoice price of the tires.

**USED TIRES:**

Sears, Roebuck and Co. registration records have been searched and a list of names and addresses has been provided to Cooper Tire & Rubber Company on June 1, 1999. Consumers who may have purchased tires with the subject identification number(s) will be notified of the RECALL. Attached for your information is a copy of the notification being sent to such consumers. Tires removed from consumer vehicles as a result of this RECALL should be replaced with tires of like size and construction bearing identification numbers other than those listed above.

We have advised the consumer to return his recalled tire(s) and his letter to you. If your inspection verifies that the consumer has a tire(s) with the suspect identification number, the tire(s) should be replaced, mounted and balanced at no charge, if presented for remedy within sixty (60) days after (i) receipt of this letter or (ii) notice that a replacement tire(s) is available (if not available at the time of the inspection). It is expected that replacement tire(s) will be available at the time of inspection; however, if the tires are not available at the time of inspection, they will be available within twenty-one (21) days. After expiration of the sixty (60) days, tires will be replaced under our normal adjustment policy.

We have advised the consumer that it will take approximately thirty (30) minutes each to replace the recalled tires. For any tires removed from consumer vehicles during such sixty (60) day period, Cooper Tire & Rubber Company will authorize an allowance of \$6.00 per tire to cover mounting and balancing.

**YOU ARE PROHIBITED BY FEDERAL LAW FROM SELLING NEW OR USED TIRES COVERED BY THIS NOTIFICATION.**

Tires removed from consumer vehicles must be listed on our standard Tire and Tube Claim Form. The Claim Form must be properly completed and signed by the consumer. This claim form must accompany the shipment according to standard adjustment procedures.

For the purpose of the RECALL, the Claim Form must include RECALL tires only. The word "RECALL" must be printed directly below the name and address on the claim form. All tires should be identified in crayon with the Claim Form reference number per standard adjustment procedures.

Upon verification by Sears, Roebuck and Co., credit will be issued to you on a no charge replacement basis if replaced by you and returned to Cooper Tire Company, Regional Inspection Point, 709 Glesener Ave., Findlay, Ohio 45840, on or before ninety (90) days after notice of this RECALL.

You should return in one shipment all recalled used tires to the inspection point as indicated on the attached map. These tires should be classified as SCRAP and shipped as SCRAP RUBBER TIRES, freight collect. Freight collect privileges apply only within the prescribed time period. Any tires returned after the designated time will be handled under our regular adjustment procedures.

Cooper Tire & Rubber Company also requests that you advise it of any additional customers of yours, if any, who have purchased the tires described above for which the name/address has not previously been submitted so that such customers can be advised tires can be scheduled.

If you have any questions pertaining to the implementation of this RECALL or need assistance, please contact our Consumer Relations Department or Jedd Emans.

Sincerely,

T. R. Griffith

TRG/jec

Attachments

SD1060699



## THE COOPER TIRE COMPANY

A DIVISION OF GOODYEAR TIRE & RUBBER COMPANY

701 LIMA AVENUE  
FINDLAY, OHIO 45840-2916  
TELEPHONE (419) 423-1321

Dear Customer:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Cooper Tire & Rubber Company has determined that a defect which relates to motor vehicle safety exists in some tires purchased at Sears Auto Centers, NTB - National Tire & Battery and Tire America by Sears, which are identified as follows:

P215/70R14 Viper Radial G/T

Identification numbers: 3DHYUDN468  
3DHYUDN478

Our company's surveillance indicates that the tires described above may not have adequate rubber coverage of the belt edge due to low tread gauge under the shoulder slots. Such a condition could result in a separation. If the separation is not detected, continued use may cause the ply cords to break and the tubeless liner to tear and lose the inflating air. Loss of air might result in loss of control of the vehicle.

We are voluntarily recalling all of the tires with the identification numbers above. To insure your safety and satisfaction with this product, please check the D.O.T. Registration Number on the sidewall of your tires, opposite the white lettering and about one inch from where the tire meets the rim. Compare this number to the Identification Numbers shown above. If any of your tires has an Identification Number that matches either of the numbers above, or you are not sure of the Identification Number, please return your tires and this letter to any Sears Auto Center, NTB - National Tire & Battery or Tire America by Sears location. If their inspection verifies that you have a tire or tires with the suspect identification number, they will be replaced, mounted and balanced at no charge to you if you have presented them within sixty (60) days after (i) receipt of this letter or (ii) notice that a replacement tire is available (if not available at the time of inspection). It is expected that replacement tires will be available at the time of inspection; however, if the tires are not available at the time of inspection, they will be available within twenty-one (21) days after that. After expiration of the sixty (60) day period, tires will be replaced under our normal adjustment policy.

The time required to determine if the tire is a recalled tire is only a few minutes, plus approximately thirty (30) minutes per tire if replacement is required.

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AN EQUAL OPPORTUNITY EMPLOYER

Should any questions or problems arise while your tires are being inspected or replaced, please call Consumer Relations at (1-800-854-6288). We will attempt to be of service to you. If in the event you are unable to obtain replacement of these tires(s) without charge to you, within the sixty (60) day period described above, you may so notify the Secretary of Transportation at the following address: Administrator, National Highway Traffic Safety Administration, Washington, DC 20590, or phone NHTSA the "Hot Line" 800-424-9393 or (202)366-0123 in the Washington, DC area.

We regret this inconvenience, but are sure that you understand our interest in your safety and satisfaction with your tires. Please visit your local Sears Auto Center, NTB - National Tire & Battery or Tire America by Sears store immediately for free replacement of the recalled tires. Give this letter to them so that it can be returned to us for purposes of this recall.

Sincerely,

S. P. Cramer  
Director, Consumer Relations

SFC:jec

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TO BE COMPLETED BY STORE

Tires inspected and replaced \_\_\_\_\_  
(date)

Unit Number, Name and address \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Dealer: Please complete the above, attach letter to the tire and tube claim form and return with the recalled tires.

SC1060699